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WEINBERG WHEELER
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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

BOBBY STEELE, as parent of and on behalf of
C.S., a minor,

Case No.: 2:24-cv-01869-JAD-MDC

[Lower Case No. A-24-901265-C
Clark County District Court]

CLARK COUNTY SCHOOL DISTRICT, a
politica; subdivision of the State of Nevada, and
DOES I through X, and ROE
CORPORATIONS.

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND DISCOVERY
DEADLINES**

(SECOND REQUEST)

Defendants.

Pursuant to Federal Rule of Civil Procedure 29(b) and Local Rule 26-3, the parties, by and through their respective counsel, hereby stipulate and request that the discovery deadlines in this matter be extended by ninety (90) days. This is the second request to extend discovery deadlines.

I. REQUIREMENTS OF STIPULATIONS TO EXTEND DISCOVERY UNDER FRCP 29(b)

Federal Rule of Civil Procedure 29(b) states in relevant part that motion or stipulation to extend or reopen discovery shall include:

- (1) A statement specifying the discovery completed;
- (2) A specific description of the discovery that remains to be completed;

(3) The reasons why the discovery remaining was not completed within the time limits set by the discovery order;

(4) A proposed schedule for completing all remaining discovery;

Accordingly, the parties submit the following information:

II. A STATEMENT OF SPECIFYING THE DISCOVERY COMPLETED:

- On December 13, 2024 Plaintiff served her Initial Early Case Conference Disclosure of Witnesses and Exhibits.
- On March 6, 2025 Plaintiff served her First Set of Requests for Production of Documents to Defendant.
- On March 20, 2025 Plaintiff served her First Set of Interrogatories and Request for Admissions to Defendant.

III. SPECIFIC DESCRIPTION OF THE DISCOVERY THAT REMAINS TO BE COMPLETED:

- Deposition of Plaintiff(s)
- Deposition of 30(b)(6) witness for Defendant
- Depositions of percipient witnesses
- Expert discovery
- Depositions of Experts
- Any other discovery the parties deem necessary.

IV. THE REASONS WHY DISCOVERY REMAINING WAS NOT COMPLETED WITHIN TIME FRAME SET BY THE DISCOVERY ORDER

The parties have diligently pursued discovery and are acting in good faith. However, several developments necessitate additional time:

1. Plaintiff recently retained new lead counsel, Joshua L. Benson, Esq., who is diligently working to become fully acquainted with the factual record and procedural posture of the case to ensure effective representation.
2. Mr. Benson requested dates for the depositions of several percipient witnesses; however, since school is out of session for summer break, the requested depositions cannot be set until mid to late August. Therefore, the requested extension will allow all parties additional time to depose these witnesses.

1 3. Additionally, the parties are actively exploring the potential for resolution and require
 2 more time to engage in meaningful settlement discussions without incurring
 3 unnecessary litigation costs.
 4 4. This request is made in good faith, not for purposes of delay, and is the parties' first
 5 request to extend the discovery schedule.

6 **V. PROPOSED SCHEDULE FOR COMPLETING ALL REMAINING**
 7 **DISCOVERY:**

8 The parties agree that an additional ninety (90) days of discovery would be warranted:

	CURRENT DATES	PROPOSED DATES
Close of Discovery	September 2, 2025	December 1, 2025
Final date to file motions to amend pleadings or add parties	June 4, 2025	Closed
Final Date for Expert Disclosures	July 7, 2025	October 6, 2025
Rebuttal Disclosures	August 5, 2025	November 3, 2025
Dispositive Motions	October 6, 2025	January 5, 2026
Joint Pretrial Order	November 4, 2025	February 2, 2026

16 This Stipulation is entered into in good faith, in the interest of judicial economy, and not
 17 for the purposes of delay.

18 DATED this 16th day of June, 2025

19 **BENSON ALLRED INJURY LAW**

21 */s/ Joshua L. Benson*
 22 Joshua L. Benson, Esq.
 23 BENSON ALLRED INJURY LAW
 24 333 N. Rancho Drive, Suite 420
 25 Las Vegas, Nevada 89106

26 LEX TECNICA, LTD.
 27 Nicholas R. Anderson, Esq.
 28 Scott T. Whitworth, Esq.
 29 10161 Park Run Drive, Suite 150
 30 Las Vegas, Nevada 89145
 31 *Attorneys for Plaintiff*

16 DATED this 16th day of June, 2025

17 **WEINBERG, WHEELER, HUDGINS,
 18 GUNN & DIAL, LLC**

21 */s/ Jacqueline V. Nichols*
 22 Phillip N. Smith, Jr., Esq.
 23 Jacqueline V. Nichols, Esq.
 24 Trisha R. Delos Santos, Esq.
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29 *Attorneys for Defendant Clark County School
 30 District*

ORDER

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2 Based upon the forgoing and having reviewed and considered the above Stipulation by the
3 parties, and good cause appearing, IT IS HEREBY ORDERED that the discovery deadline dates
4 be extended as follows:

	CURRENT DATES	PROPOSED DATES
Close of Discovery	September 2, 2025	December 1, 2025
Final date to file motions to amend pleadings or add parties	June 4, 2025	Closed
Final Date for Expert Disclosures	July 7, 2025	October 6, 2025
Rebuttal Disclosures	August 5, 2025	November 3, 2025
Dispositive Motions	October 6, 2025	January 5, 2026
Joint Pretrial Order	November 4, 2025	February 2, 2026

IT IS SO ORDERED.

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12 If dispositive motions are filed, the deadline for
13 filing the joint pretrial order will be suspended
14 until 30 days after decision on the dispositive
15 motions or further court order. The disclosures
16 required by Fed. R. Civ. P. 26(a)(3) and any
objections to them must be included in the joint
pretrial order.

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Hon. Maximiliano D. Couvillier III
United States Magistrate Judge

DATED: 6/23/2025